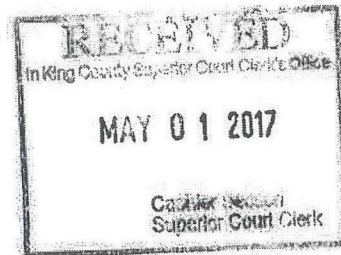


# EXHIBIT 1

RECEIVED

17 JUL 11 PM 3:59

CITY OF SEATTLE  
MAYOR'S OFFICE



Superior Court of Washington  
County of King

In re:

DENNIS ROBBERS

Plaintiff,

Vs.

CITY OF SEATTLE, MATHEW  
BLACKBURN, and DANIEL AUDERER

Defendants

No.

17-2-11206-2 SEA  
COMPLAINT FOR DAMAGES

I. PARTIES

- 1.1 The plaintiff, Dennis Robbers, at all time material hereto, resided in King County, Washington.
- 1.2 Defendant City of Seattle, Seattle Police Department is a municipal corporation.
- 1.3 Defendant Mathew Blackburn was, at all relevant times, a city of Seattle, Seattle Police Department Officer. Mathew Blackburn is named in this lawsuit in his individual and official capacities.
- 1.4 Defendant Mathew Blackburn, at all relevant times, resided in King County.

1.5 Defendant Daniel Auderer was, at all relevant times, a city of Seattle, Seattle Police Department Officer. Daniel Auderer is named in this lawsuit in his individual and official capacities.

1.6 Defendant Daniel Auderer, at all relevant times, resided in King County.

## II. JURISDICTION AND VENUE

2.1 This Court has Jurisdiction over the parties and the subject matter of this action by virtue of 42 U.S.C. Sec. 1983, 42 U.S.C Sec. 1988, RCW 49.60.30. and RCW 2.08.010.

## III. BACKGROUND FACTS

3.1 On 5-2-15 the plaintiff was at the Harborview Emergency Room waiting area to be seen for pain in my leg and foot. Someone sitting next to the plaintiff falsely accused him of "playing with himself."

3.2 The nurse on duty, Joan Ross, on the basis of the above person's statement told the plaintiff that he needed to leave. The plaintiff requested to know why he could not get the treatment he had come for.

3.3 Then someone in a state trooper uniform (whom the plaintiff believes to have been Clarence Williams) came over, stood in front of the plaintiff, and lifted the plaintiff out of his chair by grabbing the front of the plaintiff's shirt. The plaintiff tried to get the person off of himself. The person threatened to call the police.

3.4 The plaintiff asked the person to call the police, believing he would thereby receive help in his quest to obtain medical assistance for the pain in his leg and foot.

1 3.5 The person in the trooper uniform told the plaintiff to go outside, but the plaintiff could  
2 not walk to anywhere else, his foot was so swollen that he could not get his shoe on and  
3 Swedish Hospital was too far for him to walk to.  
4  
5 3.6 Then two Seattle Police officers came through the door (Mathew Blackburn and Daniel  
6 Auderer).  
7  
8 3.7 The plaintiff was glad to see them, he began to explain what had happened – that he  
9 needed treatment and was being removed from the emergency room.  
10  
11 3.8 The plaintiff was talking to the first officer, Mathew Blackburn, asking for an  
12 explanation of why they could kick him out of the hospital explaining that he needed  
13 medical treatment.  
14  
15 3.9 During the middle of this conversation the other officer Daniel Auderer started tapping  
16 the plaintiff on the shoulder in an annoying manner. The plaintiff then turned and  
17 requested that officer Daniel Auderer not do that. The plaintiff then turned back to the  
18 first officer Mathew Blackburn to finish the conversation they were having. At that  
19 time the second officer Daniel Auderer pulled the plaintiff down backwards. The first  
20 officer Mathew Blackburn then jumped on top of the plaintiff. The person in the state  
21 trooper uniform, in the meantime, grabbed my previously injured leg causing me to  
22 scream out in pain. Another trooper or officer held down my legs. At this time there  
23 were five men holding me down, either security guards, policemen, and state troopers).  
24 In the meantime the first officer Mathew Blackburn began slamming his fists into my  
25 head. Afterward, when they tried to pick me up I could not stand.

#### IV. CAUSES OF ACTION

1 4.1 Plaintiff hereby realleges the substance of sections I, II, and III and by this reference  
2 incorporates them herein.

3 4.2 Defendant's conduct was the proximate cause of the injuries sustained by the plaintiff.

4 4.3 The above stated facts give rise to a claim of racial discrimination in violation of RCW  
5 49.60 *et seq.*

6 4.4 The above stated facts give rise to a claim for assault and for false imprisonment.

7 4.5 The above stated facts give rise to a claim for intentional infliction of emotional distress.

8 4.6 The above stated facts give rise to a claim for negligent infliction of emotional distress.

9 4.7 The above stated facts give rise to a claim for outrage.

10 4.8 Defendant Mathew Blackburn's conduct is an abridgement of the plaintiff's equal  
11 protection rights under the Fourteenth Amendment, the Fourth Amendment, to the  
12 Constitution of the United States and his federal statutory civil rights and was committed  
13 under color of law in violation of 42 U.S.C. Sec. 1983.

14 4.8 Defendant Daniel Auderer's conduct is an abridgement of the plaintiff's equal protection  
15 rights under the Fourteenth Amendment, the Fourth Amendment, to the Constitution of  
16 the United States and his federal statutory civil rights and was committed under color of  
17 law in violation of 42 U.S.C. Sec. 1983.

18  
19  
20 **V. RELIEF REQUESTED**

21 5.1 The plaintiff hereby realleges the substance of sections I, II, III, and IV and by this  
22 reference incorporates them herein.

23 5.2 Because of the defendants' wrongful acts described above, the plaintiff has suffered  
24 substantial humiliation, mental and emotional distress, and other damages to be proved  
25

1 at trial.

2 WHEREFORE, Plaintiff respectfully requests this Court grant him relief, including:

- 3 a. Emotional distress, pain and suffering, and any medical expenses flowing therefrom,  
4 and damages to be proved at trial;  
5  
6 b. Special damages in an amount to be proved at trial;  
7  
8 c. Punitive damages;  
9  
10 d. The plaintiff's reasonable attorney fees pursuant to RCW 49.60.030(2) and 42 U.S.C.  
11 Sec 1988;  
12  
13 e. Costs of suit as provided by RCW 49.60.030(2) and 42 U.S.C. Sec 1988;  
14  
15 f. Prejudgment interest at the highest lawful rate;  
16  
17 g. Such other and further relief as the Court may deem just and equitable.  
18  
19  
20  
21  
22  
23  
24  
25

DATED this 1<sup>st</sup> day of May, 2017

  
\_\_\_\_\_  
Marcus G. Lang, WSBA #23977  
Attorney for Plaintiff Dennis Robbers

# EXHIBIT 2



RECEIVED  
17 JUL 11 PM 3:59  
CITY OF SEATTLE  
MAYOR'S OFFICE

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

ROBBERS, DENNIS

Plaintiff(s),

vs.

CITY OF SEATTLE, MATHEW  
BLACKBURN, and DANIEL  
AUDERER

Respondent(s)

NO. 17-2-11206-2 SEA

ORDER SETTING CIVIL CASE SCHEDULE

ASSIGNED JUDGE: Doyle, Theresa B., Dept. 13

FILED DATE: 5/1/2017

TRIAL DATE: 4/30/2018

SCOMIS CODE: \*ORSCS

A civil case has been filed in the King County Superior Court and will be managed by the Case Schedule on Page 3 as ordered by the King County Superior Court Presiding Judge.

I. NOTICES

**NOTICE TO PLAINTIFF:** The Plaintiff may serve a copy of this *Order Setting Case Schedule (Schedule)* on the Defendant(s) along with the *Summons and Complaint/Petition*. Otherwise, the Plaintiff shall serve the *Schedule* on the Defendant(s) within 10 days after the later of: (1) the filing of the *Summons and Complaint/Petition* or (2) service of the Defendant's first response to the *Complaint/Petition*, whether that response is a *Notice of Appearance*, a response, or a Civil Rule 12 (CR 12) motion. The *Schedule* may be served by regular mail, with proof of mailing to be filed promptly in the form required by Civil Rule 5 (CR 5).

"I understand that I am required to give a copy of these documents to all parties in this case."

MARCUS LANG

PRINT NAME

Marcus Lang

SIGN NAME



**I NOTICES (continued)**

**NOTICE TO ALL PARTIES:**

All attorneys and parties should make themselves familiar with the King County Local Rules [KCLCR] -- especially those referred to in this *Schedule*. In order to comply with the *Schedule*, it will be necessary for attorneys and parties to pursue their cases vigorously from the day the case is filed. For example, discovery must be undertaken promptly in order to comply with the deadlines for joining additional parties, claims, and defenses, for disclosing possible witnesses [See KCLCR 26], and for meeting the discovery cutoff date [See KCLCR 37(g)].

**CROSSCLAIMS, COUNTERCLAIMS AND THIRD PARTY COMPLAINTS:**

A filing fee of \$240 must be paid when any answer that includes additional claims is filed in an existing case.

**KCLCR 4.2(a)(2)**

A Confirmation of Joinder, Claims and Defenses or a Statement of Arbitrability must be filed by the deadline in the schedule. The court will review the confirmation of joinder document to determine if a hearing is required. If a Show Cause order is issued, all parties cited in the order must appear before their Chief Civil Judge.

**PENDING DUE DATES CANCELED BY FILING PAPERS THAT RESOLVE THE CASE:**

When a final decree, judgment, or order of dismissal of all parties and claims is filed with the Superior Court Clerk's Office, and a courtesy copy delivered to the assigned judge, all pending due dates in this *Schedule* are automatically canceled, including the scheduled Trial Date. It is the responsibility of the parties to 1) file such dispositive documents within 45 days of the resolution of the case, and 2) strike any pending motions by notifying the bailiff to the assigned judge.

Parties may also authorize the Superior Court to strike all pending due dates and the Trial Date by filing a *Notice of Settlement* pursuant to KCLCR 41, and forwarding a courtesy copy to the assigned judge. If a final decree, judgment or order of dismissal of all parties and claims is not filed by 45 days after a *Notice of Settlement*, the case may be dismissed with notice.

If you miss your scheduled Trial Date, the Superior Court Clerk is authorized by KCLCR 41(b)(2)(A) to present an *Order of Dismissal*, without notice, for failure to appear at the scheduled Trial Date.

**NOTICES OF APPEARANCE OR WITHDRAWAL AND ADDRESS CHANGES:**

*All parties to this action must keep the court informed of their addresses.* When a Notice of Appearance/Withdrawal or Notice of Change of Address is filed with the Superior Court Clerk's Office, parties must provide the assigned judge with a courtesy copy.

**ARBITRATION FILING AND TRIAL DE NOVO POST ARBITRATION FEE:**

A Statement of Arbitrability must be filed by the deadline on the schedule if the case is subject to mandatory arbitration and service of the original complaint and all answers to claims, counterclaims and cross-claims have been filed. If mandatory arbitration is required after the deadline, parties must obtain an order from the assigned judge transferring the case to arbitration. **Any party filing a Statement must pay a \$220 arbitration fee.** If a party seeks a trial de novo when an arbitration award is appealed, a fee of \$250 and the request for trial de novo must be filed with the Clerk's Office Cashiers.

**NOTICE OF NON-COMPLIANCE FEES:**

All parties will be assessed a fee authorized by King County Code 4A.630.020 whenever the Superior Court Clerk must send notice of non-compliance of schedule requirements and/or Local Civil Rule 41.

King County Local Rules are available for viewing at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk).

## II. CASE SCHEDULE


✓	CASE EVENTS	DATE
	Case Filed and Schedule Issued.	5/1/2017
✓	Last Day for Filing Statement of Arbitrability without a Showing of Good Cause for Late Filing [See KCLMAR2.1(a) and Notices on page 2]. <b>\$220 Arbitration fee must be paid</b>	10/9/2017
✓	<b>DEADLINE</b> to file Confirmation of Joinder if not subject to Arbitration [See KCLCR 4.2(a) and Notices on page 2]	10/9/2017
	<b>DEADLINE</b> for Hearing Motions to Change Case Assignment Area [KCLCR 82(e)]	10/23/2017
	<b>DEADLINE</b> for Disclosure of Possible Primary Witnesses [See KCLCR 26(k)]	11/27/2017
	<b>DEADLINE</b> for Disclosure of Possible Additional Witnesses [KCLCR 26(k)]	1/8/2018
	<b>DEADLINE</b> for Jury Demand [See KCLCR 38(b)(2)]	1/22/2018
	<b>DEADLINE</b> for Change in Trial Date [See KCLCR 40(e)(2)]	1/22/2018
	<b>DEADLINE</b> for Discovery Cutoff [See KCLCR 37(g)]	3/12/2018
	<b>DEADLINE</b> for Engaging in Alternative Dispute Resolution [See KCLCR 16(b)]	4/2/2018
	<b>DEADLINE</b> for Exchange Witness & Exhibit Lists & Documentary Exhibits [See KCLCR 4(i)]	4/9/2018
✓	<b>DEADLINE</b> to file Joint Confirmation of Trial Readiness [See KCLCR 16(a)(1)]	4/9/2018
	<b>DEADLINE</b> for Hearing Dispositive Pretrial Motions [See KCLCR 56; CR56]	4/16/2018
✓	Joint Statement of Evidence [See KCLCR 4(k)]	4/23/2018
	<b>DEADLINE</b> for filing Trial Briefs, Proposed Findings of Fact and Conclusions of Law and Jury Instructions (Do not file proposed Findings of Fact and Conclusion of Law with the Clerk)	4/23/2018
	Trial Date [See KCLCR 40]	4/30/2018

The ✓ indicates a document that must be filed with the Superior Court Clerk's Office by the date shown.

## III. ORDER

Pursuant to King County Local Rule 4 [KCLCR 4], IT IS ORDERED that the parties shall comply with the schedule listed above. Penalties, including but not limited to sanctions set forth in Local Rule 4(g) and Rule 37 of the Superior Court Civil Rules, may be imposed for non-compliance. It is FURTHER ORDERED that the party filing this action must serve this *Order Setting Civil Case Schedule* and attachment on all other parties.

DATED: 5/1/2017



\_\_\_\_\_  
PRESIDING JUDGE

#### IV. ORDER ON CIVIL PROCEEDINGS FOR ASSIGNMENT TO JUDGE

##### **READ THIS ORDER BEFORE CONTACTING YOUR ASSIGNED JUDGE.**

This case is assigned to the Superior Court Judge whose name appears in the caption of this case schedule. The assigned Superior Court Judge will preside over and manage this case for all pretrial matters.

**COMPLEX LITIGATION:** If you anticipate an unusually complex or lengthy trial, please notify the assigned court as soon as possible.

**APPLICABLE RULES:** Except as specifically modified below, all the provisions of King County Local Civil Rules 4 through 26 shall apply to the processing of civil cases before Superior Court Judges. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**CASE SCHEDULE AND REQUIREMENTS:** Deadlines are set by the case schedule, issued pursuant to Local Civil Rule 4.

**THE PARTIES ARE RESPONSIBLE FOR KNOWING AND COMPLYING WITH ALL DEADLINES IMPOSED BY THE COURT'S LOCAL CIVIL RULES.**

##### **A. Joint Confirmation regarding Trial Readiness Report**

No later than twenty one (21) days before the trial date, parties shall complete and file (with a copy to the assigned judge) a joint confirmation report setting forth whether a jury demand has been filed, the expected duration of the trial, whether a settlement conference has been held, and special problems and needs (e.g., interpreters, equipment).

The Joint Confirmation Regarding Trial Readiness form is available at [www.kingcounty.gov/courts/scforms](http://www.kingcounty.gov/courts/scforms). If parties wish to request a CR 16 conference, they must contact the assigned court. Plaintiff's/petitioner's counsel is responsible for contacting the other parties regarding the report.

##### **B. Settlement/Mediation/ADR**

a. Forty five (45) days before the trial date, counsel for plaintiff/petitioner shall submit a written settlement demand. Ten (10) days after receiving plaintiff's/petitioner's written demand, counsel for defendant/respondent shall respond (with a counter offer, if appropriate).

b. Twenty eight (28) days before the trial date, a Settlement/Mediation/ADR conference shall have been held. **FAILURE TO COMPLY WITH THIS SETTLEMENT CONFERENCE REQUIREMENT MAY RESULT IN SANCTIONS.**

##### **C. Trial**

Trial is scheduled for 9:00 a.m. on the date on the case schedule or as soon thereafter as convened by the court. The Friday before trial, the parties should access the court's civil standby calendar on the King County Superior Court website [www.kingcounty.gov/courts/superiorcourt](http://www.kingcounty.gov/courts/superiorcourt) to confirm the trial judge assignment.

#### **MOTIONS PROCEDURES**

##### **A. Noting of Motions**

**Dispositive Motions:** All summary judgment or other dispositive motions will be heard with oral argument before the assigned judge. The moving party must arrange with the hearing judge a date and time for the hearing, consistent with the court rules. Local Civil Rule 7 and Local Civil Rule 56 govern procedures for summary judgment or other motions that dispose of the case in whole or in part. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**Non-dispositive Motions:** These motions, which include discovery motions, will be ruled on by the assigned judge without oral argument, unless otherwise ordered. All such motions must be noted for a date by which the ruling is requested; this date must likewise conform to the applicable notice requirements. Rather than noting a time of day, the

Note for Motion should state "Without Oral Argument." Local Civil Rule 7 governs these motions, which include discovery motions. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**Motions in Family Law Cases not involving children:** Discovery motions to compel, motions in limine, motions relating to trial dates and motions to vacate judgments/dismissals shall be brought before the assigned judge. All other motions should be noted and heard on the Family Law Motions calendar. Local Civil Rule 7 and King County Family Law Local Rules govern these procedures. The local rules can be found at [www.kingcounty.gov/courts/clerk/rules](http://www.kingcounty.gov/courts/clerk/rules).

**Emergency Motions:** Under the court's local civil rules, emergency motions will usually be allowed only upon entry of an Order Shortening Time. However, some emergency motions may be brought in the Ex Parte and Probate Department as expressly authorized by local rule. In addition, discovery disputes may be addressed by telephone call and without written motion, if the judge approves in advance.

**B. Original Documents/Working Copies/ Filing of Documents:** All original documents must be filed with the Clerk's Office. Please see information on the Clerk's Office website at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk) regarding the requirement outlined in LGR 30 that attorneys must e-file documents in King County Superior Court. The exceptions to the e-filing requirement are also available on the Clerk's Office website. The local rules can be found at [www.kingcounty.gov/courts/clerk/rules](http://www.kingcounty.gov/courts/clerk/rules).

The working copies of all documents in support or opposition must be marked on the upper right corner of the first page with the date of consideration or hearing and the name of the assigned judge. The assigned judge's working copies must be delivered to his/her courtroom or the Judges' mailroom. Working copies of motions to be heard on the Family Law Motions Calendar should be filed with the Family Law Motions Coordinator. Working copies can be submitted through the Clerk's office E-Filing application at [www.kingcounty.gov/courts/clerk/documents/eWC](http://www.kingcounty.gov/courts/clerk/documents/eWC).

**Service of documents:** Pursuant to Local General Rule 30(b)(4)(B), e-filed documents shall be electronically served through the e-Service feature within the Clerk's eFiling application. Pre-registration to accept e-service is required. E-Service generates a record of service document that can be e-filed. Please see the Clerk's office website at [www.kingcounty.gov/courts/clerk/documents/efiling](http://www.kingcounty.gov/courts/clerk/documents/efiling) regarding E-Service.

**Original Proposed Order:** Each of the parties must include an original proposed order granting requested relief with the working copy materials submitted on any motion. **Do not file the original of the proposed order with the Clerk of the Court.** Should any party desire a copy of the order as signed and filed by the judge, a pre-addressed, stamped envelope shall accompany the proposed order. The court may distribute orders electronically. Review the judge's website for information: [www.kingcounty.gov/courts/SuperiorCourt/judges](http://www.kingcounty.gov/courts/SuperiorCourt/judges).

**Presentation of Orders for Signature:** All orders must be presented to the assigned judge or to the Ex Parte and Probate Department, in accordance with Local Civil Rules 40 and 40.1. Such orders, if presented to the Ex Parte and Probate Department, shall be submitted through the E-Filing/Ex Parte via the Clerk application by the attorney(s) of record. E-filing is not required for self-represented parties (non-attorneys). If the assigned judge is absent, contact the assigned court for further instructions. If another judge enters an order on the case, counsel is responsible for providing the assigned judge with a copy.

**Proposed orders finalizing settlement and/or dismissal by agreement of all parties shall be presented to the Ex Parte and Probate Department.** Such orders shall be submitted through the E-Filing/Ex Parte via the Clerk application by the attorney(s) of record. E-filing is not required for self-represented parties (non-attorneys). Formal proof in Family Law cases must be scheduled before the assigned judge by contacting the bailiff, or formal proof may be entered in the Ex Parte Department. **If final order and/or formal proof are entered in the Ex Parte and Probate Department, counsel is responsible for providing the assigned judge with a copy.**

#### **C. Form**

Pursuant to Local Civil Rule 7(b)(5)(B), the initial motion and opposing memorandum shall not exceed 4,200 words and reply memoranda shall not exceed 1,750 words without authorization of the court. The word count includes all portions of the document, including headings and footnotes, except 1) the caption; 2) table of contents and/or authorities, if any; and 3) the signature block. Over-length memoranda/briefs and motions supported by such memoranda/briefs may be stricken.

***IT IS SO ORDERED. FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ORDER MAY RESULT IN DISMISSAL OR OTHER SANCTIONS. PLAINTIFF/PEITITONER SHALL FORWARD A COPY OF THIS ORDER AS SOON AS PRACTICABLE TO ANY PARTY WHO HAS NOT RECEIVED THIS ORDER.***

  
\_\_\_\_\_  
PRESIDING JUDGE

# EXHIBIT 3

KING CO SUPERIOR CT  
BARBARA MINER  
DIRECTOR & SUP CRT CLERK  
SEATTLE WA

FILED

17 MAY -1 PM 3:53

KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA

17-2-11206-2

Rept. Date	Acct. Date	Time
05/01/2017	05/01/2017	03:54 PM

Receipt/Item #	Tran-Code	Docket-Code
2017-14-02182/01	1100	#FFR

Cashier: KRP

# KING COUNTY SUPERIOR COURT

## CASE ASSIGNMENT AREA DESIGNATION and CASE INFORMATION COVER SHEET

(CICS)

Paid By: MARCUS LANG, AT LAW PS  
Transaction Amount: \$240.00

Pursuant to King County Code 4A.630.060, a faulty document fee of \$15 may be assessed to new case filings missing this sheet.

CASE NUMBER: 17-2-11206-2  
(Provided by the Clerk)

CASE CAPTION: DENNIS ROBBERS V. CITY OF SEATTLE, OFF1, AND OFF2

(New case: Print name of person starting case vs. name of person or agency you are filing against.)  
(When filing into an existing family law case, the case caption remains the same as the original filing.)

Please mark one of the boxes below:

☒ **Seattle Area**, defined as:

All of King County north of Interstate 90 and including all of the Interstate 90 right-of-way; all the cities of Seattle, Mercer Island, Bellevue, Issaquah and North Bend; and all of Vashon and Maury Islands.

☐ **Kent Area**, defined as:

All of King County south of Interstate 90 except those areas included in the Seattle Case Assignment Area.

I certify that this case meets the case assignment criteria, described in King County LCR 82(e).

Marcus Lang 23977  
Signature of Attorney WSBA Number

5/1/2017  
Date

or

\_\_\_\_\_  
Signature of person who is starting case

\_\_\_\_\_  
Date

\_\_\_\_\_  
Address, City, State, Zip Code of person who is starting case if not represented by attorney

ORIGINAL



**KING COUNTY SUPERIOR COURT**  
**CASE ASSIGNMENT AREA DESIGNATION and CASE INFORMATION COVER SHEET**

**CIVIL**

Please check the category that best describes this case.

**APPEAL/REVIEW**

- ☐ Administrative Law Review (ALR 2)\*  
(Petition to the Superior Court for review of rulings made by state administrative agencies.( e.g. DSHS Child Support, Good to Go passes, denial of benefits from Employment Security, DSHS, L & I))
- ☐ DOL Revocation (DOL 2)\*  
(Appeal of a DOL revocation Implied consent-Test refusal ONLY.) RCW 46.20.308(9)

**CONTRACT/COMMERCIAL**

- ☐ Breach of Contract (COM 2)\*  
(Complaint involving money dispute where a breach of contract is involved.)
- ☐ Commercial Contract (COM 2)\*  
(Complaint involving money dispute where a contract is involved.)
- ☐ Commercial Non-Contract (COL 2)\*  
(Complaint involving money dispute where no contract is involved.)
- ☐ Third Party Collection (COL 2)\*  
(Complaint involving a third party over a money dispute where no contract is involved.)

**JUDGMENT**

- ☐ Abstract, Judgment, Another County (ABJ 2)  
(A certified copy of a judgment docket from another Superior Court within the state.)
- ☐ Confession of Judgment (MSC 2)\*  
(The entry of a judgment when a defendant admits liability and accepts the amount of agreed-upon damages but does not pay or perform as agreed upon.)
- ☐ Foreign Judgment (from another State or Country) (FJU 2)  
(Any judgment, decree, or order of a court of the United States, or of any state or territory, which is entitled to full faith and credit in this state.)
- ☐ Tax Warrant or Warrant (TAX 2)  
(A notice of assessment by a state agency or self-insured company creating a judgment/lien in the county in which it is filed.)
- ☐ Transcript of Judgment (TRJ 2)  
(A certified copy of a judgment from a court of limited jurisdiction (e.g. District or Municipal court) to a Superior Court.)

### PROPERTY RIGHTS

- ☐ Condemnation/Eminent Domain (CON 2)\*  
(Complaint involving governmental taking of private property with payment, but not necessarily with consent.)
- ☐ Foreclosure (FOR 2)\*  
(Complaint involving termination of ownership rights when a mortgage or tax foreclosure is involved, where ownership is not in question.)
- ☐ Land Use Petition (LUP 2)\*  
(Petition for an expedited judicial review of a land use decision made by a local jurisdiction.) RCW 36.70C.040
- ☐ Property Fairness (PFA 2)\*  
(Complaint involving the regulation of private property or restraint of land use by a government entity brought forth by Title 64.)
- ☐ Quiet Title (QTI 2)\*  
(Complaint involving the ownership, use, or disposition of land or real estate other than foreclosure.)
- ☐ Residential Unlawful Detainer (Eviction) (UND 2)  
(Complaint involving the unjustifiable retention of lands or attachments to land, including water and mineral rights.)
- ☐ Non-Residential Unlawful Detainer (Eviction) (UND 2)  
(Commercial property eviction.)

### OTHER COMPLAINT/PETITION

- ☐ Action to Compel/Confirm Private Binding Arbitration (MSC 2)  
(Petition to force or confirm private binding arbitration.)
- ☐ Bond Justification (MSC 2)  
(Bail bond company desiring to transact surety bail bonds in King County facilities.)
- ☐ Change of Name (CHN 5)  
(Petition for name change, when domestic violence/antiharassment issues require confidentiality.)
- ☐ Certificate of Rehabilitation (MSC 2)  
(Petition to restore civil and political rights.)
- ☐ Certificate of Restoration of Opportunity (MSC 2)  
(Establishes eligibility requirements for certain professional licenses)
- ☐ Civil Commitment (sexual predator) (PCC 2)  
(Petition to detain an individual involuntarily.)
- ☐ Deposit of Surplus Funds (MSC 2)  
(Deposit of extra money from a foreclosure after payment of expenses from sale and obligation secured by the deed of trust.)
- ☐ Emancipation of Minor (EOM 2)  
(Petition by a minor for a declaration of emancipation.)
- ☐ Foreign Subpoena (MSC 2)  
(To subpoena a King County resident or entity for an out of state case.)

- |  |  |
|--|--|
| <p><input type="checkbox"/> Frivolous Claim of Lien (MSC 2)<br/>(Petition or Motion requesting a determination that a lien against a mechanic or materialman is excessive or unwarranted.)</p> <p><input type="checkbox"/> Injunction (INJ 2)*<br/>(Complaint/petition to require a person to do or refrain from doing a particular thing.)</p> <p><input type="checkbox"/> Interpleader (MSC 2)<br/>(Petition for the deposit of disputed earnest money from real estate, insurance proceeds, and/or other transaction(s).)</p> <p><input type="checkbox"/> Malicious Harassment (MHA 2)*<br/>(Suit involving damages resulting from malicious harassment.) RCW 9a.36.080</p> <p><input type="checkbox"/> Non-Judicial Filing (MSC 2)<br/>(See probate section for TEDRA agreements. To file for the record document(s) unrelated to any other proceeding and where there will be no judicial review.)</p> <p><input type="checkbox"/> Other Complaint/Petition (MSC 2)*<br/>(Filing a Complaint/Petition for a cause of action not listed.)</p> <p><input type="checkbox"/> Public records Act (PRA 2)*<br/>(Actions filed under RCW 42.56.)</p> <p><input type="checkbox"/> Receivership (MSC 2)<br/>(The process of appointment by a court of a receiver to take custody of the property, business, rents and profits of a party to a lawsuit pending a final decision on disbursement or an agreement.)</p> <p><input type="checkbox"/> Relief from Duty to Register (RDR2)<br/>(Petition seeking to stop the requirement to register.)</p> | <p><input type="checkbox"/> Restoration of Firearm Rights (RFR 2)<br/>(Petition seeking restoration of firearms rights under RCW 9.41.040 and 9.41.047.)</p> <p><input type="checkbox"/> School District-Required Action Plan (SDR 2)<br/>(Petition filed requesting court selection of a required action plan proposal relating to school academic performance.)</p> <p><input type="checkbox"/> Seizure of Property from the Commission of a Crime-Seattle (SPC 2)*<br/>(Seizure of personal property which was employed in aiding, abetting, or commission of a crime, from a defendant after conviction.)</p> <p><input type="checkbox"/> Seizure of Property Resulting from a Crime-Seattle (SPR 2)*<br/>(Seizure of tangible or intangible property which is the direct or indirect result of a crime, from a defendant following criminal conviction. (e.g., remuneration for, or contract interest in, a depiction or account of a crime.))</p> <p><input type="checkbox"/> Structured Settlements- Seattle (MSC 2)<br/>(A financial or insurance arrangement whereby a claimant agrees to resolve a personal injury tort claim by receiving periodic payments on an agreed schedule rather than as a lump sum.)</p> <p><input type="checkbox"/> Vehicle Ownership (MSC 2)*<br/>(Petition to request a judgment awarding ownership of a vehicle.)</p> <p><b>TORT, ASBESTOS</b></p> <p><input type="checkbox"/> Personal Injury (PIN 2)*<br/>(Complaint alleging injury resulting from asbestos exposure.)</p> <p><input type="checkbox"/> Wrongful Death (WDE 2)*<br/>(Complaint alleging death resulting from asbestos exposure.)</p> |
|--|--|

**TORT, MEDICAL MALPRACTICE**

☐ Hospital (MED 2)\*  
(Complaint involving injury or death resulting from a hospital.)

☐ Medical Doctor (MED 2)\*  
(Complaint involving injury or death resulting from a medical doctor.)

☐ Other Health care Professional (MED 2)\*  
(Complaint involving injury or death resulting from a health care professional other than a medical doctor.)

**TORT, MOTOR VEHICLE**

☐ Death (TMV 2)\*  
(Complaint involving death resulting from an incident involving a motor vehicle.)

☐ Non-Death Injuries (TMV 2)\*  
(Complaint involving non-death injuries resulting from an incident involving a motor vehicle.)

☐ Property Damages Only (TMV 2)\*  
(Complaint involving only property damages resulting from an incident involving a motor vehicle.)

☐ Victims Vehicle Theft (VVT 2)\*  
(Complaint filed by a victim of car theft to recover damages.) RCW 9A.56.078

**TORT, NON-MOTOR VEHICLE**

☐ Implants (PIN 2)

☐ Other Malpractice (MAL 2)\*  
(Complaint involving injury resulting from other than professional medical treatment.)

☒ Personal Injury (PIN 2)\*

(Complaint involving physical injury not resulting from professional medical treatment, and where a motor vehicle is not involved.)

☐ Products Liability (TTO 2)\*

(Complaint involving injury resulting from a commercial product.)

☐ Property Damages (PRP 2)\*

(Complaint involving damage to real or personal property excluding motor vehicles.)

☐ Property Damages-Gang (PRG 2)\*

(Complaint to recover damages to property related to gang activity.)

☐ Tort, Other (TTO 2)\*

(Any other petition not specified by other codes.)

☐ Wrongful Death (WDE 2)\*

(Complaint involving death resulting from other than professional medical treatment.)

**WRIT**

☐ Habeas Corpus (WHC 2)

(Petition for a writ to bring a party before the court.)

☐ Mandamus (WRM 2)\*\*

(Petition for writ commanding performance of a particular act or duty.)

☐ Review (WRV 2)\*\*

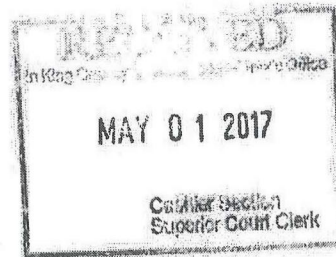
(Petition for review of the record or decision of a case pending in the lower court; does not include lower court appeals or administrative law reviews.)

\* The filing party will be given an appropriate case schedule at time of filing.

\*\* Case schedule will be issued after hearing and findings.

# EXHIBIT 4

RECEIVED  
17 JUL 11 PM 3:59  
CITY OF SEATTLE  
MAYOR'S OFFICE



Superior Court of Washington  
County of King

DENNIS ROBBERS

Plaintiff,

vs.

CITY OF SEATTLE, MATHEW  
BLACKBURN, and DANIEL AUDERER

Defendants

No. 17-2-11200-2 SEA

SUMMONS (20 days)

STATE OF WASHINGTON TO: CITY OF SEATTLE

A lawsuit has been started against you in the above entitled court  
By Dennis Robbers, Plaintiff. Plaintiff's claim is stated in the written complaint,  
a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the  
complaint by stating your defense in writing, and by serving a copy upon  
the person signing this summons within 20 days after the service of this  
summons, excluding the day of service, or a default judgment may be entered  
against you without notice. A default judgment is one where plaintiff is  
entitled to what he asks for because you have not responded. If you serve a  
notice of appearance on the undersigned person, you are entitled to notice  
before a default judgment may be entered.

You may demand that the plaintiff file this lawsuit with the court. If  
you do so, the demand must be in writing and must be served upon the person  
signing this summons. Within 14 days after you serve the demand, the plaintiff must file this  
lawsuit with the court, or the service on you of this summons and complaint will be void.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that  
your written response, if any, may be served on time.

*Summons - Page 1 of 2*

MARCUS G. LANG,  
ATTORNEY AT LAW  
119 First Ave. S., Suite 500  
Seattle, WA 98104  
Phone (206) 903-0828 Fax (206) 621-8777  
marcuslang2000@gmail.com

1 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the State of  
2 Washington.

3  
4 DATED this 1<sup>st</sup> day of May, 2017.

5 LAW OFFICES OF MARCUS G. LANG

6  
7   
8 Marcus G. Lang

9 Attorney for Plaintiff

10 119 First Avenue, Suite 500

11 Seattle, WA 98104

12 (206) 903-0828

13 FILE ORIGINAL OF YOUR RESPONSE  
14 WITH THE CLERK OF THE COURT AT:

15 Clerk of Court  
16 King County Superior Court  
17 516 Third Avenue – Room E-609  
18 Seattle, WA 98104

19 SERVE A COPY OF YOUR  
20 RESPONSE ON:

21 Plaintiff's attorney: Marcus G. Lang  
22 119 First Avenue South, Suite 500  
23 Seattle, WA 98104 (206) 903-0828  
24  
25



# EXHIBIT 5

FILED

17 MAY -1 PM 3:53

KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA

Superior Court of Washington  
County of King

DENNIS ROBBERS

Plaintiff,

vs.

CITY OF SEATTLE, MATHEW  
BLACKBURN, and DANIEL AUDERER

Defendants

17-2-11206-2 SEA

SUMMONS (20 days)

STATE OF WASHINGTON TO: MATHEW BLACKBURN

A lawsuit has been started against you in the above entitled court  
By Dennis Robbers, Plaintiff. Plaintiff's claim is stated in the written complaint,  
a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the  
complaint by stating your defense in writing, and by serving a copy upon  
the person signing this summons within 20 days after the service of this  
summons, excluding the day of service, or a default judgment may be entered  
against you without notice. A default judgment is one where plaintiff is  
entitled to what he asks for because you have not responded. If you serve a  
notice of appearance on the undersigned person, you are entitled to notice  
before a default judgment may be entered.

You may demand that the plaintiff file this lawsuit with the court. If  
you do so, the demand must be in writing and must be served upon the person  
signing this summons. Within 14 days after you serve the demand, the plaintiff must file this  
lawsuit with the court, or the service on you of this summons and complaint will be void.

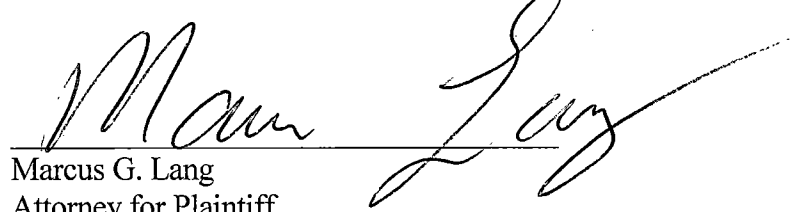
If you wish to seek the advice of an attorney in this matter, you should do so promptly so that  
your written response, if any, may be served on time.

ORIGINAL

1 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the State of  
2 Washington.

3  
4 DATED this 1<sup>st</sup> day of May, 2017.

5 LAW OFFICES OF MARCUS G. LANG

6  
7 

8 Marcus G. Lang  
9 Attorney for Plaintiff  
10 119 First Avenue, Suite 500  
Seattle, WA 98104  
(206) 903-0828

11 FILE ORIGINAL OF YOUR RESPONSE  
12 WITH THE CLERK OF THE COURT AT:

13 Clerk of Court  
14 King County Superior Court  
516 Third Avenue – Room E-609  
15 Seattle, WA 98104

SERVE A COPY OF YOUR  
RESPONSE ON:

16 Plaintiff's attorney: Marcus G. Lang  
17 119 First Avenue South, Suite 500  
18 Seattle, WA 98104 (206) 903-0828  
19  
20  
21  
22  
23  
24  
25

# EXHIBIT 6

FILED

17 MAY -1 PM 3:53

KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA

Superior Court of Washington  
County of King

DENNIS ROBBERS

Plaintiff,

vs.

CITY OF SEATTLE, MATHEW  
BLACKBURN, and DANIEL AUDERER

Defendants

No. 17-2-11206-2 SEA

SUMMONS (20 days)

STATE OF WASHINGTON TO: DANIEL AUDERER

A lawsuit has been started against you in the above entitled court  
By Dennis Robbers, Plaintiff. Plaintiff's claim is stated in the written complaint,  
a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the  
complaint by stating your defense in writing, and by serving a copy upon  
the person signing this summons within 20 days after the service of this  
summons, excluding the day of service, or a default judgment may be entered  
against you without notice. A default judgment is one where plaintiff is  
entitled to what he asks for because you have not responded. If you serve a  
notice of appearance on the undersigned person, you are entitled to notice  
before a default judgment may be entered.

You may demand that the plaintiff file this lawsuit with the court. If  
you do so, the demand must be in writing and must be served upon the person  
signing this summons. Within 14 days after you serve the demand, the plaintiff must file this  
lawsuit with the court, or the service on you of this summons and complaint will be void.

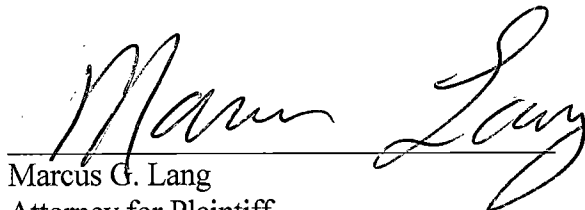
If you wish to seek the advice of an attorney in this matter, you should do so promptly so that  
your written response, if any, may be served on time.

ORIGINAL

1 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the State of  
2 Washington.

3  
4 DATED this 1<sup>st</sup> day of May, 2017.

5 LAW OFFICES OF MARCUS G. LANG

6  
7 

8 Marcus G. Lang  
9 Attorney for Plaintiff  
10 119 First Avenue, Suite 500  
11 Seattle, WA 98104  
12 (206) 903-0828

13 FILE ORIGINAL OF YOUR RESPONSE  
14 WITH THE CLERK OF THE COURT AT:

15 Clerk of Court  
16 King County Superior Court  
17 516 Third Avenue – Room E-609  
18 Seattle, WA 98104

13 SERVE A COPY OF YOUR  
14 RESPONSE ON:

15 Plaintiff's attorney: Marcus G. Lang  
16 119 First Avenue South, Suite 500  
17 Seattle, WA 98104 (206) 903-0828

# EXHIBIT 7



Hon. Theresa B. Doyle

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

ROBBERS, DENNIS,

Plaintiff,

v.

CITY OF SEATTLE, MATHEW  
BLACKBURN, and DANIEL AUDERER,

Defendants.

No. 17-2-11206-2 SEA

NOTICE OF APPEARANCE

[Clerk's Action Required]

TO: Clerk of the above-entitled court; and

TO: Dennis Robbers, and his counsel, Marcus Lang:

PLEASE NOTE that defendants City of Seattle, Mathew Blackburn, and Daniel Auderer, by and through their undersigned attorney, and without waiving any objections as to improper service, process, jurisdiction, venue, or any other CR 12 insufficiencies, enter their appearance in this action and requests that all future papers and pleadings in this matter, except original process, be served on their attorney at the address stated below.

NOTICE OF APPEARANCE - 1

**Peter S. Holmes**  
Seattle City Attorney  
701 5th Avenue, Suite 2050  
Seattle, WA 98104-7097  
(206) 684-8200

1 DATED this 31<sup>st</sup> day of July, 2017.

2 PETER S. HOLMES  
3 Seattle City Attorney

4 By: /s/Josh Johnson  
5 Josh Johnson, WSBA# 33570  
6 Assistant City Attorney  
7 E-mail: Josh.Johnson@seattle.gov

8 Seattle City Attorney's Office  
9 701 Fifth Avenue, Suite 2050  
10 Seattle, WA 98104  
11 Phone: (206) 684-8200

12 *Attorney for Defendants City of Seattle, Mathew Blackburn, and*  
13 *Daniel Auderer*

**CERTIFICATE OF SERVICE**

I certify that on the 31st day of July, 2017, I caused a true and correct copy of this document to be served on the following in the manner indicated below:

Marcus G. Lang Attorney at Law 119 First Ave. S., Ste. 500 Seattle, WA 98104  [Attorney for Plaintiff]	( X ) U.S. Mail ( X ) Via E-mail: <a href="mailto:Marcuslang2000@gmail.com">Marcuslang2000@gmail.com</a>
---	--

/s/ Kelly Nakata  
Kelly Nakata, Legal Assistant  
[Kelly.Nakata@seattle.gov](mailto:Kelly.Nakata@seattle.gov)

# EXHIBIT 8

**King County**[Home](#)[News](#)[Services](#)[Comments](#)[Search](#)**ECR Online**

SUPERIOR COURT CLERK'S OFFICE

[Home](#) | [Logout](#) | [Help](#)**All Documents****My Account Info**

Pages Remaining: 916  
[Buy More](#)  
Pages Selected: 0  
Reports Selected: 0  
Amount Remaining: 229.00  
Amount Purchased: 29468.50

**INSTRUCTIONS**

- ▶ 1) Select the documents you wish to purchase by checking the box to the left of the Sub #. 2) Click on the Get Document button.

**All Documents**[Viewable](#)**Case Number:** 17-2-11206-2**Case Title:** ROBBERS  
VS  
SEATTLE  
CITY OF  
ET AL**Filter By:** - All -

Select	Sub #	Pages	Date	Description
<input type="checkbox"/>	1	7	05/01/2017	SUMMONS & COMPLAINT
<input type="checkbox"/>	2	6	05/01/2017	SET CASE SCHEDULE
<input checked="" type="checkbox"/>	3	5	05/01/2017	CASE INFORMATION COVER SHEET
<input type="checkbox"/>	4	2	05/01/2017	SUMMONS
<input checked="" type="checkbox"/>	5	2	05/01/2017	SUMMONS
<input type="checkbox"/>	6	3	07/31/2017	NOTICE OF APPEARANCE OF DEFENDANTS

**Get Document(s)**[King County](#) | [News](#) | [Services](#) | [Comments](#) | [Search](#)

Links to external sites do not constitute endorsements by King County.  
By visiting this and other King County web pages,  
you expressly agree to be bound by terms and conditions of the site.  
[The details.](#)

Build: 3.3.3  
Environment: Production